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OBJECTIONS TO "INDUSTRY AGREEMENT ON ADVERTISING DISCLOSURE OF FEDERAL TRADE COMMISSION TEST DETERMINATIONS OF TAR AND NICOTINE CONTENT" DATED SEPTEMBER 26TH AND SEPTEMBER 29TH

1. Point-of-Sale

Point-of-sale material must be included if all other media such as billboards are. Now that billboards are included, we are and increasingly will be at a substantial disadvantage to R. J. Reynolds.

As it now stands, point-of-sale material, including big posters, and super market and drug store carton racks and single-pack racks require no tar and nicotine figures. This means the brand names, "Winston", and/or "Salem", and/or "Camel", and/or "Doral", etc., have the advantage of appearing in all super markets and drug stores where RJR has racks--with no tar and nicotine requirements--even though this is permanent, extensive advertising.

Additionally, with their large sales force they will put up large posters (I would estimate as large as two-sheet billboards) with either all of a brand's variations shown or one package ambiguously shown. They have an advantage with their large sales force because the cumbersome regulation for multiple tar and nicotine listings would be absent here.

2. Tar & Nicotine Listing Method

It is in the interest of Philip Morris U. S. A. with its multiple sizes, flavors and packagings to have the tar and nicotine industry agreement proposed and finalized so that one listing would suffice in an ad whether one or more of the various forms of a given brand were shown. This single tar and nicotine listing in advertisements would list the range of tar and nicotine for all varieties of that brand; e. g., Marlboro - 17.9 to 21.6mg. Tar; 1.24 to 1.50mg. Nicotine. I assume that paragraph IX, page 10, in the September 29th dated version of the proposed industry agreement is where the change should occur. I hope it can be effected for our benefit.

As a sweetener to the FTC, if the range listing by itself is unacceptable, add the lowest and highest counts for all brands from the last FTC report; e. g., 2 to 31mg. Tar, 0.1 to 2.2 mg. Nicotine. The FTC may cotton to this, as it has been previously prescribed.

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Source: https://www.industrydocuments.ucsf.edu/docs/syvf0000

3. Outdoor

Inclusion of "billboards", not stated in the September 23rd copy of above proposed industry agreement, raises problems which jeopardize use of the medium:

(a) Where one package of a brand is shown but not specifically identified as one size--that is, it is ambiguous in this respect--all tars and all nicotines for that brand name must be listed.

(b) Where more than one size is shown, then the appropriate numbers of tar and nicotine must be listed separately.

(c) Therefore, we are in the position of probably having to run billboard ads--and all ads--with only one specific size of cigarette shown. This makes it less efficient to advertise for a brand like Marlboro its main volume businesses, 80 and 85mm., and to acquaint the public with the new and growing 100's. This is even more difficult in outdoor than magazines.

(d) Where just "Marlboro" or "Marlboro Country" appears; e.g., sports scoreboards and information devices, also spectaculars, we must now put up five tar and nicotines for Marlboro. I don't think it is practicable to do this.

(e) In the same manner it complicates outdoor promotion unduly of Benson & Hedges 100's, Regular and Menthol; Virginia Slims, Regular and Menthol; and Multifilter, Regular and Menthol, for it requires two listings of tar and nicotines.

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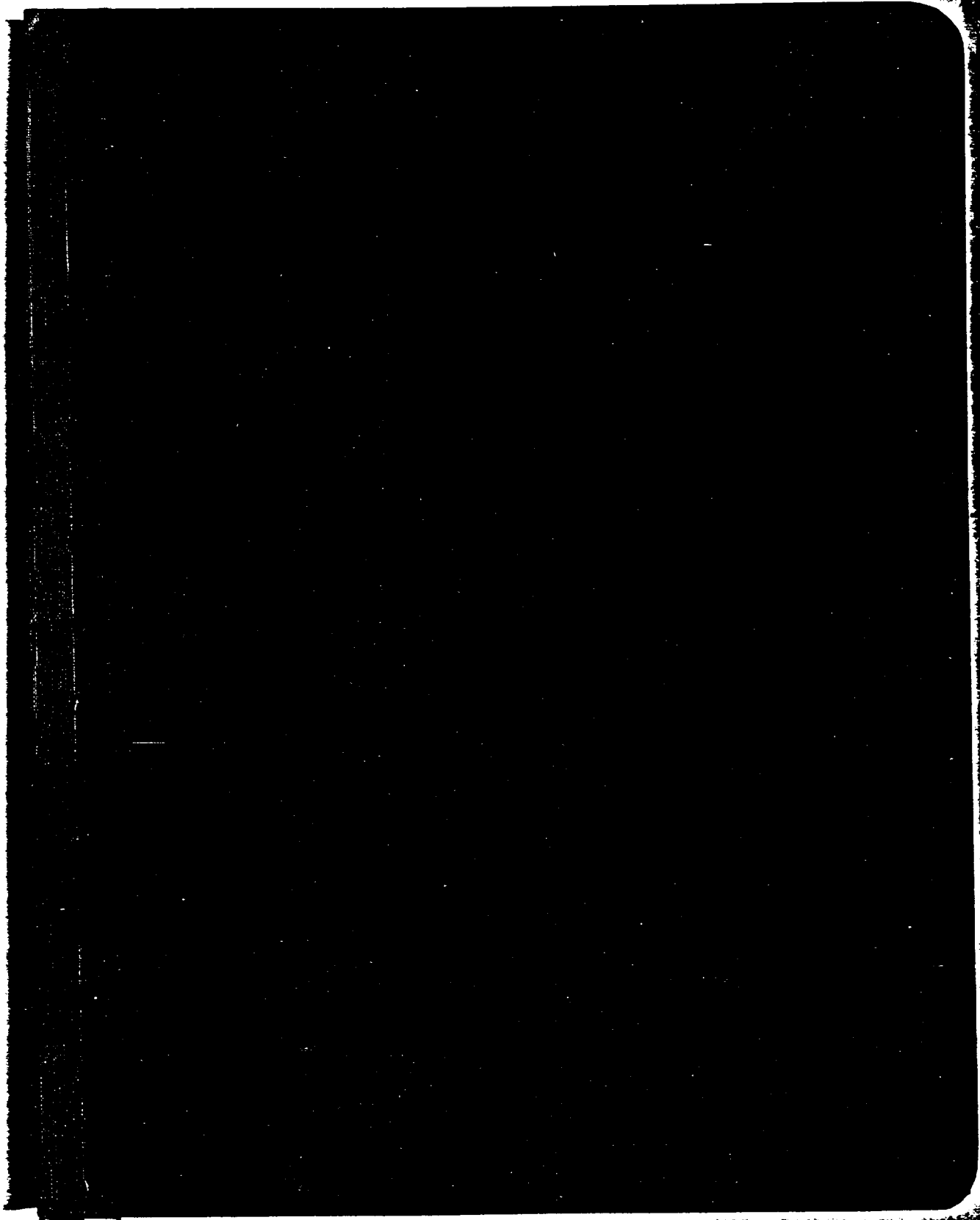
Source: https://www.industrydocuments.ucsf.edu/docs/syvj0000



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